

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

CHRISTINA AGUAYO

Plaintiff

v.

UNITED STATES OF AMERICA

Defendant

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CIVIL ACTION NO. 3:23-cv-00539-E

JURY TRIAL DEMANDED

PLAINTIFF’S AGREED MOTION FOR EXTENSION OF TIME
TO RESPOND TO DEFENDANT’S MOTION TO DISMISS
PLAINTIFF’S SECOND AMENDED COMPLAINT

Plaintiff moves this Court, by agreement of counsel for Defendant, to extend the deadline for her to respond to Defendant’s motion to dismiss Plaintiff’s second amended complaint (the “Motion”) from May 16, 2023 to May 26, 2023 and would show as follows:

1. On April 25, 2023, Defendant filed the Motion with a deadline to respond on May 16, 2023.
2. With the agreement of Defendant, Plaintiff seeks a 10-day extension until May 26, 2023 to file a response to the Motion. The extension is sought due to lead counsel for Plaintiff, Robert E. Goodman, Jr., being unavailable to work on or finalize a response to the Motion while traveling to New Orleans, Louisiana for the wedding of his son from May 10, 2023 through May 16, 2023.
3. By email dated May 1, 2023, counsel for Defendant confirmed Defendant’s agreement to this motion.

WHEREFORE, Plaintiff prays that this Court grant her an extension to respond to Defendant's Motion to May 26, 2023 and grant her any other relief to which she is entitled.

Respectfully submitted,

/s/ Robert E. Goodman, Jr.

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ATTORNEY FOR PLAINTIFF

CERTIFICATE OF CONFERENCE

I hereby certify that counsel for Defendant confirmed by email on May 1, 2023 that Defendant does not oppose the relief sought in this motion.

/s/ Robert E. Goodman, Jr.

Robert E. Goodman, Jr.

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the above and foregoing was forwarded to counsel of record via the Court's electronic filing system and/or via email on the 2nd day of May 2023.

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/s/ Robert E. Goodman, Jr.
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